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ELLEN and TERRY AMBROFF

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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO – ECF PROGRAM
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19 ELLEN AMBROFF and TERRY
20 AMBROFF,

21 Plaintiffs,

22 v.

23 AMERICAN MEDICAL SYSTEMS, INC.,
24 and DOES ONE through TWENTY-FIVE,
inclusive,

25 Defendants.
26

CASE NO. C08-04289 NC

**STIPULATION AND [PROPOSED]
SCHEDULING ORDER**

27 For the reasons stated in the Joint Case Management Conference Statement recently filed
28 as Document 98 herein, and subject to the approval of this Court, plaintiffs Ellen Ambroff and

Kenny
&
Markowitz
L.L.P.

1 Terry Ambroff ("plaintiffs") and defendant American Medical Systems, Inc. ("defendant"),
2 through their counsel of record, hereby stipulate to extend the dates to complete expert discovery,
3 which are set forth in the March 17, 2011 Scheduling Order (Document 90), as follows:

4 •Completion of Plaintiffs' Expert Depositions	September 30, 2011
5 •Completion of Defendant's Expert Depositions	October 14, 2011
6 •Expert Discovery Cutoff	October 14, 2011

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8 Plaintiffs and defendant further stipulate to a briefing schedule for dispositive motions and
9 *Daubert* motions similar to the schedule previously in effect and set forth in the March 17, 2011
10 Scheduling Order, to be set by the Court forthwith and to commence following the completion of
11 expert discovery.

12 Respectfully submitted,

13 DATED: July 26, 2011

KENNEY & MARKOWITZ L.L.P

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15 By: /s/ Kimberly I. McIntyre
KEN M. MARKOWITZ
KIMBERLY I. MCINTYRE
16 Attorneys for Defendant
AMERICAN MEDICAL SYSTEMS INC.

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19 DATED: July 26, 2011

HERSH & HERSH

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21 By: /s/ Nancy Hersh
NANCY HERSH
22 AMY ESKIN
Attorneys for Plaintiffs
23 ELLEN & TERRY AMBROFF

24 **IT IS SO ORDERED.**

25 DATED: July 26, 2011

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27 
HON. NATHANAEL COUSINS
28 UNITED STATES MAGISTRATE JUDGE

Kenney
&
Markowitz
L.L.P.